

June 3, 2019

BY ECF

Hon. Barbara Moses  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
Courtroom 20A  
New York, NY 10007

Re: *Lek Securities Corp., et al. v. Nicolas Louis, et al.*,  
Case No. 1:19-cv-02142 (RMB/BCM)  
Joint Letter on Status of Discovery and Settlement Efforts

Dear Judge Moses:

This joint status letter is respectfully submitted in response to Your Honor's Order, dated May 28, 2019 (ECF No. 98) (the "Order"), instructing the parties to submit a joint letter "outlining the progress of discovery to date, including any outstanding discovery disputes requiring judicial resolution, and updating the Court on the parties' settlement efforts. If no discovery controversies exist at that time, the parties may request that the conference [scheduled for June 4, 2019 at 10:00 a.m.] be held telephonically."

We write to inform you that the parties continue to make substantial progress towards a binding agreement and have further narrowed the remaining issues. We are very close to finalizing a binding memorandum of understanding and are hopeful that it will be completed within the next day or two. There are no outstanding discovery controversies. However, because the parties have not yet entered into a final memorandum of understanding, the parties jointly request that the conference scheduled for tomorrow be held telephonically.

Respectfully submitted,

/s Mark D. Meredith

Mark D. Meredith

cc: All Counsel of Record

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